UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 17 2016

CERTIFIED MAIL 7009 1680 0000 7642 3106
RETURN RECEIPT REQUESTED

Mr. Mike Schick
Regional Quality Assurance and Regulatory Manager
Brenntag Great Lakes, Limited Liability Company
4420 North Harley Davidson Avenue
Wauwatosa, Wisconsin 53225

REPLY TO THE ATTENTION OF:

Re: Notice of Violation
Compliance Evaluation Inspection
WID 023 350 192

Dear Mr. Schick:

On May 18, 2016 a representative of the U.S. Environmental Protection Agency inspected the Brenntag Great Lakes, LLC facility located in Menomonee Falls, Wisconsin (Brenntag Great Lakes). As a large quantity generator of hazardous waste and a storage and treatment facility, Brenntag Great Lakes is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq*. (RCRA). The purpose of the inspection was to evaluate Brenntag Great Lakes' compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Brenntag Great Lakes, EPA's review of records pertaining to Brenntag Great Lakes, and the inspector's observations, EPA has determined that Brenntag Great Lakes violated the RCRA Container Storage License Number 6017 see paragraph 1, below.

VIOLATION OF RCRA STORAGE LICENSE NUMBER 6017

At the time of the inspection, Brenntag violated the following RCRA Storage License Number 6017:

1. Brenntag's April 15, 2015 Final Determination to Conditionally Approve a Feasibility and Plan of Operation Report for a Hazardous Waste Storage and Treatment Facility specifies that the total storage capacity of the facility must not exceed 55,000 gallons and the container storage areas are to be inspected daily to identify leaks, deterioration of containers, cracks in the floor, potential leaks, etc.

   At the time of the inspection, Brenntag had not conducted daily inspections of the container storage area for the following dates: February 13 and February 14, 2016; March 5 and March 6, 2016; April 2 and April 3, 2016; April 30 and May 1, 2016; May 3 and 4, 2016, and no inspection logs from May 12 to May 17, 2016. We recommend that Brenntag identify a daily inspection back up employee.

AREA OF CONCERN

2. Satellite Accumulation Area (SAA) Containers

Under WAC § NR 662.034(3)(b) [40 CFR § 262.34(3)(b)], a generator who accumulates either hazardous waste or acutely hazardous waste listed in WAC § NR 661.33(5) in excess of the amounts listed in paragraph (a) at or near any point of generation must, with respect to that amount of excess waste , comply within 3 days with sub. (1) or other applicable provisions of Chapters NR 660 to 673. During the 3-day period the generator must continue to comply with paragraph (a)1 and 2. The generator must mark the container holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.

At the time of the inspection, Brenntag personnel had marked the "Date of Accumulation" on several SAA 55-gallon containers in the "Blending and Packaging Room." These SAA containers were not full and should not have had accumulation dates.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above license requirement. You should submit your response to Walt Francis, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Walt Francis, of my staff, at 312-353-4921 or at francis.walt@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosures

cc: Randy Malek, WDNR-Waukesha Service Center
(randall.malek@wisconsin.gov)
Michael Ellenbecker, WDNR-Sturtevant Service Center
(michael.ellenbecker@wisconsin.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:	**BRENNTAG GREAT LAKES, LLC**
FACILITY U.S. EPA ID NO.:	**WID 023 350 192**
FACILITY TYPE:	**Large Quantity Generator, Storage and Treatment Facility**
FACILITY ADDRESS:	N59 W14776 Bobolink Avenue Menomonee Falls, Wisconsin 53051
U.S. EPA REPRESENTATIVE:	Walt Francis
DATE OF INSPECTION:	May 18, 2016
SIC CODE:	2869 – Industrial Organic Chemicals, Not Elsewhere Classified 5169 – Chemicals and Allied Products, Not Elsewhere Classified 5093 – Scrap and Waste Materials
NAICS CODE:	42269 – Other Chemical and Allied Products Wholesalers 56292 – Materials Recovery Facilities 42193 – Recyclable Material Wholesalers 5622 – Waste Treatment and Disposal

PREPARED BY: _____ 6/15/2016
Walt Francis **Date**
Environmental Scientist

APPROVED BY: _____ 6/20/16
Julie Morris, Chief **Date**
Compliance Section 2
RCRA Branch

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at Brenntag Great Lakes, LLC (Brenntag Great Lakes) located at N59 W14776 Bobolink Avenue, Menomonee Falls, Wisconsin to determine compliance with the Resource Conservation and Recovery Act (RCRA) and the Wisconsin Administrative Code (WAC), with respect to Brenntag Great Lakes' management of hazardous waste, universal waste and used oil.

Participants

United States Environmental Protection Agency (U.S. EPA) Inspector -
Walt Francis, Environmental Scientist

Representatives of Brenntag Great Lakes -
Mike Schick, Regional Quality Assurance and Regulatory Manager
Amber Hayward, Product Manager

Site Description/Background Information

Brenntag is a German based international company which manages supply chains for both chemical manufacturers and consumers. Brenntag operates a global network with more than 530 locations in 74 countries with a global workforce of approximately 14,000 employees. The Brenntag Great Lakes region includes the following locations: St. Paul, Minnesota; Omaha, Nebraska; Fort Wayne, Indiana; Des Moines, Iowa; Romulus, Michigan; Chicago, Illinois; Kentwood, Michigan, Wauwatosa, Wisconsin; and Menomonee Falls, Wisconsin. The main activities at the Menomonee Falls, Wisconsin location include purchasing of chemicals in bulk and repackaging into smaller containers, or blending raw material chemicals to produce blended chemicals prior to packaging and distribution. In addition, the Menomonee Falls location is a hazardous waste transporter, a large quantity hazardous waste generator (LQG), a large quantity handler of universal waste, operates a 10-day hazardous waste transfer area, and a licensed hazardous waste facility for container storage and on-site treatment (fuel blending), separated by Bobolink Avenue. Brenntag Great Lakes handles waste materials from a wide variety of customers in Wisconsin, Michigan, Iowa, Indiana, Nebraska, Minnesota, and Illinois. The Brenntag Great Lakes North Lot of the facility is approximately 2.1 acres and is currently used for the storage and fuel blending of waste solvents, see attached Google earth image and Brenntag Evacuation Routes diagram. In addition, Brenntag Great Lakes has three isocyanate tanks, several reclaim solvent tanks on the North Lot and operates a hazardous waste 10-day transfer facility. Historically, solvent recovery operations were conducted on the South Lot of the facility. In 1981, solvent recovery operations were transferred to the North Lot. Storage and processing of hazardous waste now only occurs on the North Lot. The facility used to have solvent recovery equipment, consisting of two LUWA thin-film evaporators that were located in the norther portion of the North Lot. The facility also used to have a hazardous waste tank farm

that was also located in the northeast corner of the North Lot. The hazardous waste tank farm was closed in November 2014. Some of the seven tanks (T-79, T-80, T-91, T-93, T-94, and T-95) in the tank farm are currently utilized for storage of reclaimed solvents. The South Lot is currently used to formulate, package, store and prepare chemical products for shipment and is approximately 4.8 acres, and includes an office/quality control laboratory/warehouse building, tanker truck loading/unloading area, a bulk tank storage facility, and a railroad spur. Brenntag's in-house laboratory is currently registered with WDNR and certified to perform the following tests: corrosivity; ignitability; reactivity; PCBs; and fingerprinting. An outside laboratory is used for all items listed on TC Rule Certification Form and PCB quantification. Brenntag conducts blending, formulation and packaging activities in the warehouse area.

The storage of hazardous waste at the facility occurs in containers in the Container Storage Room, which is located in the Storage/10-Day Transfer Building. The north side of the Storage/10-Day Transfer Room is designed to manage up to 192 55-gallon containers of hazardous waste using pallets. The south side of the Storage/10-Day Transfer Room is a designated 10-day transfer area used to manage up to 168 55-gallon containers of hazardous waste using pallets. The spill collection system trenches gravity drain to conveyance piping that is connected to an exterior, aboveground, 5,925-gallon steel secondary containment tank. The fuel blending (treatment) of hazardous waste occurs in tanker trucks in the fuel blending area, which is located directly west of the former hazardous waste tank farm. Brenntag accepts primarily organic materials that are suitable for either fuel blending or reclamation mostly in 55-gallon containers and totes. The container storage facility (License number 6017) has a total storage capacity not to exceed 55,000 gallons, and must be inspected daily to identify leaks, deterioration of containers, cracks in the floor, potential leaks, etc. Universal wastes are accumulated in the Container Storage Room prior to offsite shipment. Types of universal wastes managed at Brenntag Great Lakes include used lamps and bulbs, batteries and mercury-containing devices. Brenntag Great Lakes offers collection services for hazardous and solid waste as a transporter, License numbers 10861 and 12547. Brenntag Great Lakes currently operates under an air permit issued by WDNR which includes: ten vertical 15,000 gallon storage tanks; eighteen 20,000 gallon vertical tanks; ten 3,000 gallon horizontal storage tanks; and two tank load out operations and drumming operation.

Wastes generated by Brenntag Great Lakes include:

1) Flammable hazardous waste generated by Quality Control Laboratory;
2) Line flush hazardous waste;
3) Solid hazardous waste including rags and PPE;
4) Hazardous waste caustic;
5) Hazardous waste acid;
6) Isocyanate hazardous waste;
7) Hazardous waste water;
8) Non-hazardous waste water and surfactants;
9) Hazardous waste filter bags containing blended plants mixed with acetone and isopropyl alcohol;

10) Used aerosol cans.

Brenntag Great Lakes is continuing the quarterly groundwater monitoring program and maintains financial responsibility for updated RCRA closure costs and owner financial responsibility for corrective action activities.

The Brenntag Great Lakes facility has approximately 35 employees and operates two 12-hour shifts seven days per week, except Saturday night. The Menomonee Falls facility has been at Bobolink Avenue for approximately 42 years. In 1974 Milwaukee Solvents and Chemicals Corp (Milsolv) began providing services in the areas of solvent sales and recycling. On June 30, 1998, Milsov was purchased by Brenntag. In November 2000, Millsolv and two other mid-western independent distributors formed Brenntag, which is a member of the Brenntag North America group of companies. Brenntag changed the Milsolv name to Brenntag Great Lakes, LLC on July 23, 2001. The original Part A Permit application was submitted to EPA on February 16, 1982 for the Menomonee Falls, Wisconsin facility.

At the time of the inspection, the Brenntag Great Lakes facility was operating as a LQG of hazardous waste, and a storage and treatment facility. At the time of the inspection, the last off-site shipment of hazardous waste was on May 17, 2016. Other wastes include: 1) Non-hazardous water and surfactants; 2) used fluorescent lamps; 3) used batteries; and 4) used electronic equipment. WDNR provided U.S. EPA with a copy of an April 13, 2016, "Hazardous Waste Manifest Records For Selected Generator" report for the period 2013 through February 2016 for out-bound shipments of hazardous waste from the Menomonee Falls, Wisconsin facility. The WDNR out-bound manifest report indicated that hazardous waste F005, D002, D003, F002, D001, F006, F003 are shipped off-site to: WRR Environmental Services Company, Inc., Eau Claire, Wisconsin (WID990829475); Buzzi Unicem, Greencastle, Indiana, (IND006419212); Tradebe Treatment and Recycling, LLC, East Chicago, Indiana (IND000646943); and Siemens Industry, Inc., Roseville, Minnesota (MND981098478). For the period January 6, 2016 through February 29, 2016, Brenntag Great Lakes shipped out 261,456 pounds of hazardous waste for an average of 21,788 pounds per month.

Opening Conference

U.S. EPA representative Walt Francis arrived at the Brenntag Great Lakes South Lot facility at approximately 8:15 a.m. Inspector Francis introduced himself to Mr. Mike Schick, Regional Quality Assurance and Regulatory Manager and presented his credentials. Mr. Schick took the inspector to a conference room on the second floor. Inspector Francis informed Mr. Schick of the nature, scope, and procedures of the inspection. The inspection was conducted by U.S. EPA. WDNR staff were unable to participate in the inspection. Mr. Schick told Inspector Francis that Ms. Kelsey Baier, Waste Coordinator was out of the office. A short time later, Mr. Kevin Rudser, Director of Operations stopped by the conference room and introduced himself to Inspector Francis. Mr. Schick provided the inspector with a brief overview of the facility, and provided information on the other Brenntag Great Lakes locations. Mr. Schick explained the

various hazardous wastes generated at the Menomonee Falls, Wisconsin facility, the various incoming wastes, and the fuel blending process. Inspector Francis asked Mr. Schick about used oil and universal waste. Mr. Schick explained to the inspector that the Brenntag Great Lakes facility does not generate used oil. However, customers may send used oil to Brenntag Great Lakes. Mr. Schick explained that Brenntag Great Lakes generates their own universal waste and customers may also send universal waste to Brenntag Great Lakes which is shipped to Veolia ES Technical Solutions, Port Washington, Wisconsin. Inspector Francis reviewed the 2013 EPA Biennial Reporting System (BRS) hazardous wastes, and discussed the operation of the facility. Brenntag Great Lakes did not make a CBI claim on the information gathered during the inspection. Mr. Schick allowed the inspector access to the facility to conduct the inspection.

Site Tour

The walk-through began in the Quality Control Laboratory on the second floor. Mr. Schick showed Inspector Francis two satellite accumulation containers, see photograph number 1. Inspector Francis observed that one was labeled "Waste PPE" and the other was labeled "Flammable Liquids". Mr. Schick showed Inspector Francis a one gallon SAA container of waste sulfuric acid and a one gallon container labelled "Waste F005" solvents. The walk-through continued to the first floor. Mr. Schick introduced Mr. Brad Kaehler, Plant Manager. Mr. Kaehler and Mr. Schick showed Inspector Francis the bulk loading area. Mr. Schick showed Inspector Francis a 55-gallon SAA container utilized for hose cleaning. Inspector Francis noted the container was labeled "Acetone/Methanol, F005/D035". The walk-through continued to the "West Addition". Mr. Schick showed Inspector Francis a container of water, surfactants and waste which was labeled "Non-Hazardous Waste". The walk-through continued to the Blending and Packaging Room. Mr. Schick showed Inspector Francis a 55-gallon SAA container labeled "Waste from Lines, Acetone/MEK" with a "5/16/16" accumulation date, see photograph number 2. The walk-through continued to another area in the Blending and Packaging Room. Mr. Schick showed Inspector Francis two 55-gallon SAA containers. Inspector Francis observed that both were labeled "F005" waste and were dated "5/16/16". Mr. Schick told Inspector Francis that one container was utilized for solid hazardous waste such as used PPE and the other was utilized for liquids. The walk-through continued to the North Lot facility which is on the north side of Bobolink Avenue. Mr. Schick showed Inspector Francis three tanks containing isocyantes. Inspector Francis observed three tanks which were labeled: "Toluen Diiocyanate; "H12 DMI", and "Isophorone Diisocyante". The walk-through continued to the "Older Laboratory". Mr. Schick showed Inspector Francis a 55-gallon SAA container which was labeled "F005". The walk-through continued to the Container Storage Area. Mr. Schick introduced Mr. Larry Dietrich, Shift Supervisor. Mr. Dietrich showed Inspector Francis the permitted container storage area. Inspector Francis observed 55-gallon containers dated "4/5/2016" and "2/23/2016". In addition, Inspector Francis observed three 1-cubic yard sacks of F006 hazardous waste labeled "3/16/16", "4/28/2016", see photograph number 3. Mr. Dietrich told Inspector Francis that the 55-gallon containers are staged in the container storage area until they have sufficient quantities to fill a tanker truck, see photographs number 4, 5, and 6. Mr. Dietrich showed Inspector Francis the universal waste accumulation area, see photographs

number 7 and 8. The walk-through continued to the 10-Day Transfer/Container Storage area near the loading dock, see photograph number 9. Mr. Dietrich showed Inspector Francis containers in the container storage area and the 10-day transfer area. Inspector Francis observed that the 10-Day transfer area was empty, see photograph number 10. Mr. Dietich showed Inspector Francis a 55-gallon SAA container labeled "Waste aerosol cans, D001" in this area. Mr. Dietrich showed Inspector Francis the incoming and outgoing logbook. Inspector Francis asked about the inspection logbook. Mr. Dietrich told Inspector Francis that it was up on the second floor. The walk-through continued outside to the spill prevention above ground tank. The walk-through continued to the Fuel Blending area. Mr. Schick showed Inspector Francis the Fuel Blending Pad, see photograph number 11. Mr. Schick told Inspector Francis that reclaimed solvent was being pumped from the tanker truck to a reclaimed solvent tank. Mr. Dietrich told Inspector Francis that Brenntag Great Lakes have seven tanks, three are "open". The walk-through continued to the second floor of the container storage building to review daily inspection records. Mr. Schick introduced Mr. Tad Walder from the Maintenance Department. Mr. Walder showed Inspector Francis the daily inspection records. Inspector Francis noted missing inspection dates for the following dates: February 13 and February 14, 2016; March 5 and March 6, 2016; April 2 and April 3, 2016; April 30 and May 1, 2016; May 3 and 4, 2016, and no inspection logs from May 12 to May 17, 2016. Mr. Schick, Mr. Dietrich and Inspector Francis went back to the loading dock area on the first floor to review the daily logbook. Mr. Dietrich showed Inspector Francis the last outbound shipment of hazardous waste went out on May 17, 2016 for fuel blending with the waste codes F005/F001/F002/F003/D001/D008.

Mr. Schick and Inspector Francis returned to the South Lot conference room to review some records.

Records Review

Inspector Francis asked Mr. Schick about the operating record. Mr. Schick told Inspector Francis that Mr. Dietrich's logbook was the operating record. However, Brenntag was going to implement a new computer based tracking system. Mr. Schick provided Inspector Francis with a December 18, 2015 version of the Contingency Plan. Inspector Francis asked Mr. Schick for an example waste profile from the Quality Control Laboratory. Ms. Kaoni Mazoch, Technical Services Quality Manager showed Inspector Francis a laboratory profile from a waste stream from Graybahl Collision. Mr. Schick told Inspector Francis that the hazardous waste manifests and training records were located at the Brenntag Great Lakes facility at 4420 N. Harley Davidson Road, Wauwatosa, Wisconsin. At the Wauwatosa, Wisconsin facility, Mr. Schick took Inspector Francis to a conference room. Mr. Schick introduced Ms. Amber Hayward, Product Manager. Ms. Hayward provided Inspector Francis with hazardous waste manifests and universal waste shipping bills of lading from 2015 and 2016. Inspector Francis reviewed inbound, outbound and transporter manifests. Inspector Francis reviewed a May 26, 2015 shipment of used fluorescent lamps to Veolia ES Technical Solutions, Port Washington, Wisconsin. Inspector Francis reviewed two outbound manifests from Brenntag Great Lakes to Tradebe Treatment and Recycling, LLC, East Chicago, Indiana (IND000646943). The April 22,

2015 outbound manifest included 55-gallons of waste hydrogen peroxide, D003, and the December 18, 2015 outbound manifest included 55-gallons of waste isocyanates containing toluene diisocyanate, D003. Mr. Schick provided training records for Mr. Larry Dietrich and Mr. Bill Grulkowski from 2014 and 2015. Ms. Hayward provided Inspector Francis with some Financial Assurance documents for the Brenntag Great Lakes facility.

Closing Conference

The inspector conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. Brenntag Great Lakes would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, completed inspection checklists and a copy of the photographs taken during the inspection. Inspector Francis discussed SAA container labeling and the daily inspection log. Inspector Francis provided a U.S. EPA Small Business Resources information sheet, a U.S. EPA Region 5 Pollution Prevention contact sheet, and a University of Wisconsin Extension Solid and Hazardous Waste Education Center Environmental Programs brochure to Mr. Schick.

Attachments
Inspection Checklists.
Photographs. .

LARGE QUANTITY GENERATOR INSPECTION

Revision: 08/04/2015
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate over 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month or over 1 kg of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated.	Y	662.011
B. Waste determination was made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used.	Y	662.011(3)
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers. Brunswick 268175490	Y	662.011(3)(a)1
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	Y	662.040(3)
E. Generator submitted a notification form and obtained an EPA ID#. Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	662.012

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator initiated a manifest with all off-site shipments of hazardous waste.	Y	662.020(1)
B. The manifest is used according to the instructions in the appendix to 40 CFR part 262.	Y	662.020(1)
C. The facility designated on the manifest is permitted or licensed to accept the waste.	Y	662.020(2)
D. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.	Y	662.023(3)
E. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.	Y	662.020(1)
F. If the generator received a shipment back as a rejected load, the returned waste was accumulated in compliance with the container or tank standards for less than 90 days.	Y	662.034(13)
G. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	Y	662.034(13)
H. A copy of the manifest signed by the generator is retained until the signed copy from the designated facility is received.	Y	662.040(1)
I. Copy of each manifest is kept for at least three years from the date of shipment.	Y	662.040(1)
J. Hazardous waste is packaged according to applicable DOT requirements before transport.	Y	662.030
K. Hazardous waste is labeled according to applicable DOT requirements before transport.	Y	662.031

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

L. Hazardous waste is marked according to applicable DOT requirements before transport.	Y	662.032(1)
M. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport.	Y	662.032(2)
N. Placards are offered to the initial transporter.	Y	662.033

Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	Y	668.07(1)
B. A copy of the LDR notification and certification for solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste under ss. NR 661.02 to 661.06, or exempted from ch. 291, Stats., and chs. NR 660 to 673, subsequent to the point of generation.	Y	668.07(1)(h)
C. Generator complies with the prohibition against dilution of wastes.	Y	668.03
D. A one-time written notice was sent to each treatment, storage or disposal facility with the initial waste shipment.	Y	668.07(1)
E. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	Y	668.07(1)
F. If the waste MEETS treatment standards, the LDR notice certifies wastes may be land disposed without further treatment.	Y	668.07(1)
G. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and applicable prohibitions.	Y	668.07(1)
H. A copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	Y	668.07(1)(h)
I. Underlying hazardous constituents have been identified for characteristic wastes.	Y	668.09(1)
J. Generator identifies EITHER of the following when the waste is both a listed and characterisitic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste codes. 2. The treatment standards for all applicable listed and characteristic waste codes.	Y	668.09(2)
K. If waste is treated in containers or tanks, the generator meets BOTH of the following (NR 668.07(1)(e): 1. Developed a written waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	Y	662.034(1)(d)

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the calendar year have been submitted to the Department by March 1 of the following year.	Y	662.041
B. Transporter or TSD is contacted if signed manifest is not received in 35 days.	Y	662.042(1)
C. Exception report is submitted to the Department if a signed manifest is not received within 45 days.	Y	662.042(2)
D. Copy of each annual report and exception report is kept for at least 3 years from the date of the report.	Y	662.040(2)

Section 5: Preparedness and Prevention

A. Generator has ALL of the following, unless the equipment is not necessary for the types of wastes handled (NR 665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	Y	662.034(1)(d)
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (NR 665.0033).	Y	662.034(1)(d)
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (NR 665.0034).	Y	662.034(1)(d)
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	Y	662.034(1)(d)
E. Aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	Y	662.034(1)(d)

Section 6: Contingency Plan and Emergency Procedures

A. Generator has a written contingency plan, amended SPCC plan or other emergency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge (NR 665.0051). If there is no written plan go to question 7.A.	Y	662.034(1)(d)
B. Generator has amended a SPCC plan or other emergency plan so it sufficiently incorporates hazardous waste management provisions (NR 665.0052(2)).	Y	662.034(1)(d)

Section 6: Contingency Plan and Emergency Procedures

C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams. (NR 665.0053(2)).	Y	662.034(1)(d)
D. Contingency plan was amended due to ANY of the following (NR 665.0054): 1. Contingency plan failed in an emergency. 2. Change in site design, construction, O&M, or other circumstances which affect emergency response. 3. Emergency coordinators changed. 4. Emergency equipment changed.	Y	662.034(1)(d)
E. Contingency plan identifies an emergency coordinator who meets ALL of the following (NR 665.0055): 1. Available or on call to coordinate emergency response measures. 2. Familiar with all aspects of site activities and the contingency plan. 3. Has authority to commit the resources needed to carry out the contingency plan.	Y	662.034(1)(d)
F. Contingency plan includes ALL of the following (NR 665.0052): 1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility. 2. Name, address and phone number, office and home, for each emergency coordinator. 3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services. 4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes. 5. Actions facility personnel will take in response to a fire, explosion, or hazardous waste discharge. 6. List of emergency equipment at the site, including location, description and capabilities of each item.	Y	662.034(1)(d)
G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes (NR 665.0056): 1. Activate internal alarms or communication systems. 2. Notify appropriate authorities, if their help is needed. 3. Identify the character, source, amount, and extent of discharged hazardous materials. 4. Assess hazards to human health and the environment. 5. If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003). 6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread. 7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operation. 8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material. 9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed. 10. Ensure that emergency equipment is clean and fit for use prior to resuming operations. 11. Notify the department and appropriate state and local authorities before resuming operations. 12. Submit an incident report to the department within 15 days.	Y	662.034(1)(d)

Section 7: Personnel Training Requirements

A. Generator has a program of classroom instruction or on-the-job training for personnel in hazardous waste management (NR 665.0016(1)(a)). If there is no training program go to question 8.A.	Y	662.034(1)(d)
B. Program is directed by a person trained in hazardous waste management procedures (NR 665.0016(1)(b)).	Y	662.034(1)(d)

Section 7: Personnel Training Requirements

C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed (NR 665.0016(1)(b)).	Y	662.034(1)(d)
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items (NR 665.0016(1)(c)): 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.	Y	662.034(1)(d)
E. New employees are trained within 6 months of their assignment (NR 665.0016(2)).	Y	662.034(1)(d)
F. Employees work in supervised positions until they have completed the training (NR 665.0016(2)).	Y	662.034(1)(d)
G. Personnel take part in an annual review of the training (NR 665.0016(3)).	Y	662.034(1)(d)
H. Generator keeps ALL of the following training documents (NR 665.0016(4)): 1. Job title and the employee name for each position related to hazardous waste management. 2. Job description for each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. 4. Records that required training has been given to each employee.	Y	662.034(1)(d)
I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility (NR 665.0016(5)).	Y	662.034(1)(d)

Section 8: 90-Day Container Accumulation

A. Waste is accumulated in containers. If NO, go to Section 9. SAA → permitted storage.	NO	
B. Accumulation start date is clearly marked and visible for inspection on each container.		662.034(1)(b)
C. All containers are clearly marked with the words "Hazardous Waste".		662.034(1)(c)
D. If container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).		662.034(1)(a)1
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).		662.034(1)(a)1
F. Containers are kept closed, except when it is necessary to add or remove waste (NR 665.0173(1)).		662.034(1)(a)1
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).		662.034(1)(a)1

Section 8: 90-Day Container Accumulation

H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).		662.034(1)(a)1
I. Containers of ignitable or reactive waste are located at least 50 feet from the property line (NR 665.0176).		662.034(1)(a)1
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).		662.034(1)(a)1
K. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).		662.034(1)(a)1
L. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).		662.034(1)(a)1

Section 9: Subchapter BB Standards for Equipment Leaks

A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2). 1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service. 7. Pumps or valves in heavy liquid service 8. Pressure relief devices in light liquid or heavy liquid service. 9. Flanges or other connectors.	ND	
B. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).		662.034(1)(a)
C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates < 300 hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).		662.034(1)(a)
D. If the facility determines compliance with subch. BB by documenting compliance with Clean Air Act requirements, the documentation is readily available as part of the operating record (NR 665.1064(13)).		662.034(1)(a)
E. ALL of the following information used to determine the applicability of exclusions in Questions 9.B. - 9.D. is maintained at the facility (NR 665.1064(11)): 1. Analysis determining the design capacity of the hazardous waste management unit. 2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids. 3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.		662.034(1)(a)
F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following are maintained at the facility (NR 665.1064(11)): 1. Information that the production process does not use organic compounds. 2. The process is identical to a process at another facility where the total organic content was measured at <10%. 3. The process has not changed to affect the total organic concentration of the waste.		662.034(1)(a)

Section 9: Subchapter BB Standards for Equipment Leaks

G. The facility keeps records of new determinations performed when there are any changes that could result in an increase in the total organic content of the waste in contact with equipment that is not subject to subch. BB requirements (NR 665.1064(11)).		662.034(1)(a)
H. All equipment stated in Question 9.A. is excluded from additional subch. BB requirements. If NO, complete the subch. BB inspection form.		

Section 10: Subchapter CC Level 1 Container Standards

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 11.A. (NR 665.1087(2)(a), NR 662.034(1)(a)1). 1. Between 26 and 119 gallons. 2. Greater than 119 gallons and not in light material service.	Y	
B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b)): 1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container. 2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container. 3. The initial determination is reviewed and updated at least once every 12 months. 4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to >= 500 ppmw. 5. The average VO concentration is determined by direct measurement or by knowledge. Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.	N	
C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).	Y	662.034(1)(a)1
D. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 662.034(1)(a)1, NR 665.1080(4)). Note: Certain records are to be maintained. Refer to 665.1090(9) for more information.	N	
E. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 662.034(1)(a)1, NR 665.1080(2), NR 665.1090(10)): 1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities. 2. Radioactive mixed wastes in accordance with NRC requirements	N	
F. Containers are excluded from subch. CC because BOTH of the following are met (NR 665.1080(2), NR 665.1090.(10)): 1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements. 2. Facility records include certification of such by the owner or operator and the specific air program compliance requirements for the containers	N	
G. All containers are excluded from subch. CC Level 1 standards. If YES, go to Section 11.	N	
H. Any of the following controls are used on all Level 1 containers (NR 665.1087(3)(a)): 1. Container meets applicable US DOT packaging requirements. 2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container. 3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere. Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.	Y	662.034(1)(a)1

Section 10: Subchapter CC Level 1 Container Standards

I. If Level 1 containers do not meet applicable US DOT packaging requirements, they are equipped with covers and closure devices composed of suitable materials that minimize exposure of hazardous waste to the atmosphere and maintain integrity of the covers and closure devices (NR 665.1087(3)(b)).	N/A	662.034(1)(a)1
J. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded (NR 665.1087(3)(c)1.a).	N/A	662.034(1)(a)1
K. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs (NR 665.1087(3)(c)1.b): 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.	N/A	662.034(1)(a)1
L. If a Level 1 container is opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs (NR 665.1087(3)(c)2b): 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.	N/A	662.034(1)(a)1
M. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity (NR 665.1087(3)(c)3).	N/A	662.034(1)(a)1
N. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met (NR 665.1087(3)(c)4): 1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position. 2. The device is closed when the internal pressure is within the specified operating range. 3. The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.	N/A	662.034(1)(a)1
O. Safety valves are only opened to avoid an unsafe condition (NR 665.1087(3)(c)5).	N/A	662.034(1)(a)1
P. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days (NR 665.1087(3)(d)3).	N/A	662.034(1)(a)1
Q. If repairs cannot be completed in 5 days of detecting the defect, the waste is removed from the container which is not used until it is repaired (NR 665.1087(3)(d)3).	N/A	662.034(1)(a)1

Section 11: Subchapter CC Level 2 Container Standards

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 12.	NO	
B. Any of the following controls are used on Level 2 containers: (NR 665.1087(4)(a)) 1. Container meets applicable US DOT packaging requirements. 2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring. 3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.	(	662.034(1)(a)2

Section 11: Subchapter CC Level 2 Container Standards

C. If the potential leak interface on the containers were checked, BOTH of the following were met: (NR 665.1087(4)(a)) 1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve. 2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.		662.034(1)(a)2
D. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service. (NR 665.1087(3)(e))		662.034(1)(a)2
E. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(4)(b))		662.034(1)(a)2
F. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded. (NR 665.1087(4)(c)1.a.)		662.034(1)(a)2
G. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: (NR 665.1087(4)(c)1.b.) 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.		662.034(1)(a)2
H. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: (NR 665.1087(4)(c)2.b.) 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.		662.034(1)(a)2
I. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity. (NR 665.1087(4)(c)3.)		662.034(1)(a)2
J. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: (NR 665.1087(4)(c)4.) 1. Designed to operate with no detectable organic emissions when in the closed position. 2. Closed when the internal pressure is within the specified operating range. 3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.		662.034(1)(a)2
K. Safety valves are only opened to avoid an unsafe condition. (NR 665.1087(4)(c)5.)		662.034(1)(a)2
L. When a defect is detected, initial repair efforts are made within 24 hours of detection. (NR 665.1087(4)(d)3.)		662.034(1)(a)2
M. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired. (NR 665.1087(4)(d)3.)		662.034(1)(a)2

Section 12: Subchapter CC Level 3 Container Standards

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 13.	NO	
B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device. (NR 665.1087(5)(a))		662.034(1)(a)2

Section 12: Subchapter CC Level 3 Container Standards

C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51. (NR 665.1087(5)(b)1.)		662.034(1)(a)2
D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility. (NR 665.1090(4)(a))		662.034(1)(a)2
E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(5)(f))		662.034(1)(a)2

Section 13: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 14.	Y	
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	Y	662.034(3)(a)
C. Satellite containers are under the control of the operator of the process generating the waste.	Y	662.034(3)(a)
D. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(3)(a)1
E. If a container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	N/A	662.034(3)(a)1
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.034(3)(a)1
G. Containers are marked "Hazardous Waste" or with other words that identify the contents.	Y	662.034(3)(a)2
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	Y	662.034(3)(b)
I. Generator complies with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	Y	662.034(3)(b)

Section 14: Waste Minimization

A. Generator includes waste minimization information in the annual report.	Y	662.041(3)(e)
B. Generator has a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree. Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.	Y	662.027(1)

Section 15: Used Oil

A. Used oil is managed on-site. If NO, go to Section 16	NO	
B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.		679.10(2)(a)2
C. Used oil containers and tanks are in good condition and not leaking.		679.22(2)
D. Used oil containers and tanks are marked "used oil".		679.22(3)(a)
E. Transporter has an EPA ID number, except when generator self-transports or has a tolling agreement.		679.24
F. If oil containing materials are disposed of as a solid waste, the used oil has been properly drained so there is no visible sign of free-flowing oil and a waste determination has been properly made.		679.10(3)(a)
G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.		679.23
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.		679.11

Section 16: Universal Waste

A. The facility is a small quantity handler of universal waste (never accumulates more than 11,025 lbs). If NO, state in the comments section if the facility is a universal waste nonhandler, large handler or destination facility, and go to Section 17. Note: If the facility is a large handler, complete the large quantity handler of universal waste inspection form.	NO	
B. Universal waste has not been disposed, treated or diluted. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.		673.11
C. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and not leaking.		673.13
D. Universal waste lamps and pesticides are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.		673.13
E. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".		673.14
F. Universal waste is accumulated for less than one year from the date generated or received from another handler.		673.15(1)
G. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.		673.15(2)

Section 16: Universal Waste

H. Length of accumulation time is demonstrated by any of the following: 1. Each container is marked or labeled with the earliest date the waste is generated or received 2. The individual item of waste is marked or labeled with the date it was generated or received. 3. An inventory system identifying the date the waste was generated or received is maintained. 4. The universal waste is placed in a specific accumulation area identified with the earliest date the waste was generated or received.		673.15(3)
i. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.		673.16
J. ALL of the following are met when a release occurs: 1. Release is immediately contained. 2. A waste determination is made. 3. Spill residue is disposed of properly as solid or hazardous waste.		673.17
K. Handler sends the waste to a destination facility, foreign destination or another handler. Indicate the facilities in the comments section.		673.18(1)
L. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.		673.18(3)
M. The following activities have occurred. If YES, complete the Universal Waste Small Quantity Handler inspection form. 1. Universal waste are sorted or disassembled. 2. Recalled pesticides are managed. 3. Universal waste shipments have been rejected. 4. Universal waste shipments have included hazardous or solid waste. 5. Universal waste is self-transported.		

Section 17: F006 Wastewater Treatment Sludge

A. Generator accumulates F006 sludge for more than 90 days. If NO, go to Section 18.	STORED ON-SITE	
B. The F006 waste is accumulated for no more than 180 days, unless the waste is shipped 200 miles or more.	N/A	662.034(7)
C. Pollution prevention practices are in place to reduce the amount of contaminants entering the F006 waste.		662.034(7)(a)
D. The F006 waste is legitimately recycled through metals recovery.		662.034(7)(b)
E. No more than 20,000 kg (44,100 lbs) of F006 waste is accumulated on-site.		662.034(7)(c)
F. Accumulation containers meet subch. I, AA, BB and CC standards in ch. NR 665.		662.034(7)(d)1.a
G. The accumulation start date is clearly marked and visible for inspection on each container.	Y	662.034(7)(d)3
H. Accumulation tanks meet subch. J, AA, BB and CC standards in ch. NR 665, except for NR 665.0197(3) and NR 665.0200.	N/A	662.034(7)(d)1.b

Section 17: F006 Wastewater Treatment Sludge

I. Each container and tank of F006 waste is clearly marked with the words "Hazardous Waste".		662.034(7)(d)4
J. A containment building used for accumulation meets subch. DD standards in ch. NR 665; a P.E. certification stating compliance with the design standards is in the operating record AND written procedures and documentation for emptying the unit within 180 days are on file.		662.034(7)(d)1.c
K. The accumulation of F006 waste is included in the preparedness and prevention procedures, contingency plan and personnel training program.		662.034(7)(d)5
L. If waste is accumulated for up to 270 days, the generator must ship the waste over 200 miles for metals recovery.		662.034(8)

Section 18: Generator Status Evaluation

A. Waste is accumulated for less than 90 days, except as allowed in Sections 13 and 16.	Small Quan	662.034(1)
B. More than 2,205 lbs. of non-acute hazardous waste; 2.2 lbs. of acute hazardous waste; or, 220 lbs. of residue from cleanup of an acute hazardous waste spill is generated in any month (NR 662.190(1), NR 662.220(4)).		
C. Describe other activities that the generator conducts at the facility (accumulation in tanks, recycling, 10-day transfer, transporter, used oil treatment, storage, disposal, universal waste, etc.).	Y	
D. If waste was previously accumulated in a tank system, the generator performed EITHER of the following (NR 665.0197(1), NR 665.0197(2)): 1. Closure by removing or decontaminating waste residues, contaminated containment system components, soils, structures and equipment. 2. Initiated long-term care if all contaminated soils cannot be practicably removed or decontaminated.	Y	662.034(1)(a)2

FACILITY SPECIFIC CONDITIONS

Brenntag Active Hazardous Waste Conditions

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 001	Y	Wisc Stats 289.30
The hazardous waste facility shall be operated in accordance with the approved Feasibility and Plan of Operation Report (FPOR), the requirements of ch. 291, Wis. Stats., chs. NR 660 to 670, WAC, and the conditions of this approval. The approval conditions, Wisconsin Statutes or the Wisconsin Administrative Code shall take precedence over any discrepancies with the FPOR.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 002	Y	Wisc Stats 289.30
All prior hazardous waste approvals and hazardous waste modifications issued by the Department relating to the operation of the hazardous waste facility at Brenntag are hereby nullified or superseded by this approval except for decisions related to corrective action.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 003	Y	Wisc Stats 289.30
The Department retains the jurisdiction either to require the submittal of additional information or to modify this approval at any time if, in the Department's opinion, conditions warrant further modifications. Nothing in this conditional approval shall relieve Brenntag of the legal obligation to comply with applicable federal, state and local approvals.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 004	Y	Wisc Stats 289.30
The requirements set out in s. NR 670.030, WAC, apply to this facility and are hereby incorporated by reference and made a part of this approval and of any operating licenses which may be issued for the facility based upon this approval.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 005	Y	Wisc Stats 289.30
Brenntag shall at all times maintain in good working order and operate efficiently all facilities and systems of treatment or control and related appurtenances which are installed or used to achieve compliance with the terms and conditions of the license. Proper operation and maintenance includes, but is not limited to, effective performance based on preventive maintenance, adequate funding, effective management, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 006	Y	Wisc Stats 289.30
The licenses for operating the hazardous waste units at Brenntag are subject to the annual renewal of operating license fees listed in Appendix II, ch. NR 670, WAC.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 007	Y	Wisc Stats 289.30
Brenntag shall comply with all applicable requirements of the Department's air pollution control rules stated in chs. NR 400 to 499, WAC, and directives including but not limited to obtaining all necessary permits to operate in accordance with these rules. Brenntag shall notify the Department of any change in operation that results in an increase in the maximum potential emissions of an air contaminant or which results in the emission of an air contaminant not previously emitted.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 008	Y	Wisc Stats 289.30
If at any time Brenntag becomes aware that there was a failure to disclose relevant facts in any reports, plans, or other documents submitted, or that incorrect information was submitted, Brenntag shall promptly submit such facts or correct information to the Department.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 009	Y	Wisc Stats 289.30
Brenntag shall install and maintain a bonding and grounding system in all areas of the facility where a static discharge could result in a fire or explosion that would impact the license storage and treatment areas.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 010	Y	Wisc Stats 289.30
Brenntag shall operate the facility in a manner that prevents discharges from the facility from impacting the facility and the environment.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 011	Y	Wisc Stats 289.30
Should a fire, explosion or other incident that requires implementation of the contingency plan occurs, Brenntag shall do the following: a. Take colored photo documentation of incident. b. Identify the employees who have knowledge of, or were involved in the incident. c. Retain and secure any data associated with the incident. d. Retain and secure any equipment and/or parts that were involved in the incident. e. Retain and secure wastes or residues that were involved in the incident. Brenntag shall obtain Department concurrence prior to releasing any items obtained in 11.c - e.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 013	Y	Wisc Stats 289.30
Brenntag may not store or treat hazardous in locations or quantities greater than those stated below: Table 3: Storage and Treatment Summary UnitLicenseNet Container Storage Capacity Location.....Unit Name.....Type.....Number...Capacity..Units.....not to Exceed ContainerContainer Storage**** Storage/Room**** 10-Day- South.Container Storage.6017TotalGallons.1,000 55-gallon drums. TransferContainer Storage*facility** Building.Room*capacity** *- North.Container Storage.6017not to*192 55-gallon drums. FuelFuel Blending*55,000.** BlendingArea.Container Storage.6017**6,000-gallon tanker Area.Fuel Blending**Gallonslimited to 96 hours of storage.Area.Container Treatment.439718,000./day.18,000-gallon per day.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 014	Y	Wisc Stats 289.30
All hazardous waste storage activities shall be confined to the areas specified for those purposes in the approved FPOR. The only hazardous wastes that can be stored in these areas are the hazardous wastes identified on the most recent Part A notification form dated June 5, 2013. Wastes with similar characteristics, but different hazardous waste codes, may only be managed at the facility after receiving written approval from the Department following a modification to this determination and the submission of a revised Part A application.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 015	Y	Wisc Stats 289.30
Brenntag shall maintain their existing agreements with United Sewer & Water, Inc., Volkmann Railroad Builders and the Village of Menomonee Falls in regards to meeting the 50 foot setback requirement for the hazardous waste container storage.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 016	Y	Wisc Stats 289.30
Waste received from off-site shall be processed or moved into a container storage area within twenty-four (24) hours of the hazardous waste arriving at the facility.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 017	Y	Wisc Stats 289.30
Brenntag shall sign off on the uniform hazardous waste manifests within seventy-two (72) hours of receipt of the wastes.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 018	Y	Wisc Stats 289.30
Signs and/or placards shall be used to identify the different types of wastes stored (e.g., ignitables)				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 019	Y	Wisc Stats 289.30
The identity and location of all stored hazardous wastes shall be known throughout the entire storage period.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 020	Y	Wisc Stats 289.30
When storing non-hazardous waste in the licensed hazardous waste storage units the non-hazardous waste shall be managed as if it were a hazardous waste (e.g., secondary containment, inspection, license storage capacity).				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 021	Y	Wisc Stats 289.30
Sufficient aisle space of at least two (2) feet shall be maintained in all of the storage and staging areas to allow for unobstructed movement of personnel and equipment in an emergency and to allow for inspections of the storage area.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 022	Y	Wisc Stats 289.30
Sufficient lighting shall be maintained in all of the storage areas to allow for inspections of the storage area.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 023	Y	Wisc Stats 289.30
Brenntag may operate an on-site 10-day transfer facility for incoming hazardous waste, provide that Brenntag or its contract carrier is only the transporter and is not identified on line 8 on the uniform hazardous waste manifest as a designated facility.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 024	Y	Wisc Stats 289.30
Brenntag shall not move hazardous waste from an on-site hazardous waste transfer facility to the hazardous waste storage facility or from the hazardous waste storage facility to an on-site transfer facility.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 025	Y	Wisc Stats 289.30
25.Brenntag shall clearly mark on all hazardous waste manifests or associated paperwork the date when the hazardous waste is first placed/arrived in the transfer facility. Brenntag shall ensure that on each hazardous waste manifest or associated paperwork this date is available for inspection.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 026	Y	Wisc Stats 289.30
Brenntag shall store waste in structurally sound (undamaged) U.S. DOT approved containers.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 027	Y	Wisc Stats 289.30
Lines shall be clearly marked and maintained on the floor to delineate the rows of containers from the aisles. Containers shall be stored within the lines that delineate the rows.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 028	Y	Wisc Stats 289.30
Containers shall be placed in the storage areas so that labels are visible from the aisles.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 029	Y	Wisc Stats 289.30
When storing containers two (2) or more high on pallets, containers of equal or larger size or quantity shall be stored on the bottom level.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 030	Y	Wisc Stats 289.30
Brenntag shall stack containers in a stable manner so that the containers do not tip over.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 031	Y	Wisc Stats 289.30
Brenntag shall stack containers no more than three (3) containers high.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 032	Y	Wisc Stats 289.30
Brenntag shall not stack containers when the stacking would compromise the structural integrity of the container.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 033	Y	Wisc Stats 289.30
When containers greater than twenty (20) gallons in size are stored two (2) high, pallets shall be used to separate the first level from the second level.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 034	Y	Wisc Stats 289.30
Containers shall be covered/closed except when adding or removing wastes.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 035	Y	Wisc Stats 289.30
Brenntag shall not treat more than 18,000 gallons of hazardous waste per day and 6,000 gallons of hazardous waste per batch. The amount of hazardous waste processed per day and per batch shall be recorded in the operating record.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 036	Y	Wisc Stats 289.30
The fuel blending of hazardous waste shall be conducted only in tanker trucks.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 037	Y	Wisc Stats 289.30
The equipment used for fuel blending of hazardous waste shall be located completely within the secondary containment system of the fuel blending area. The equipment used for fuel blending includes, but is not limited to: containers, hoses, pumps, tanker trailer.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 038	Y	Wisc Stats 289.30
If for any reason the fuel blending treatment facility is rendered inoperable or is not able to completely process the hazardous waste, Brenntag shall use an approved alternative method for hazardous waste disposal.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 039	Y	Wisc Stats 289.30
Brenntag shall use procedures and the best practicable control technology currently available to minimize exposure of hazardous waste to the atmosphere when transferring hazardous waste in and/or out of a container.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 040	Y	Wisc Stats 289.30
The secondary containment system shall always - regardless of any precipitation event or weather condition - be able to contain the volume of the largest container currently stored in the fuel blending area.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 041	Y	Wisc Stats 289.30
Containers used to supply the material for the fuel blending operation shall only be stored in the fuel blending area during the actual fuel blending operation.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 042	Y	Wisc Stats 289.30
The fuel blended hazardous waste in tanker trucks shall be stored for no more than 96 hours in the fuel blending storage area. Brenntag shall record in the operating record the date and time the fuel blending operation ceased on the tanker and the date and time the tanker was shipped off-site.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 043	Y	Wisc Stats 289.30
The fuel blending area shall be labeled with the words: "Hazardous Waste Fuel Blending Area".				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 044	Y	Wisc Stats 289.30
The fuel blending area shall be clearly delineated to show the boundary of the fuel blending area.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 045	Y	Wisc Stats 289.30
When repacking/ depacking is in operation, Brenntag shall at all times equip at least one (1) employee involved in the operation with a two-way radio or other electronic communication device to be used primarily in the event of an emergency.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 046	Y	Wisc Stats 289.30
If equipment becomes contaminated after use from repacking/ depacking, Brenntag shall decontaminate the equipment before the equipment is used outside of the repacking/ depacking unit or used with incompatible materials.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 047	Y	Wisc Stats 289.30
If precipitation collects in the containment structure, it shall be managed as described in the approved feasibility and plan of operation report.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 048	Y	Wisc Stats 289.30
The secondary containment systems shall be operated to prevent any migration of wastes or accumulated liquid out of the system into the air, soil, groundwater or surface water at any time.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 049	Y	Wisc Stats 289.30
The secondary containment system shall be capable of detecting and collecting releases and accumulated liquids until the collected material is removed.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 050	Y	Wisc Stats 289.30
The secondary containment structures shall be maintained to be liquid tight and free of cracks and gaps.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 051	Y	Wisc Stats 289.30
The secondary containment structures shall be promptly resealed or repaired with a chemically resistant material to maintain an impervious surface.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 052	Y	Wisc Stats 289.30
All uncontained wastes and liquids located within the secondary containment systems shall be removed from the secondary containment systems area daily and properly managed and disposed of.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 053	Y	Wisc Stats 289.30
Brenntag may not store materials or equipment whose volume will adversely affect the secondary containment capacity of the storage units, other than the equipment considered in the secondary containment system calculations included in the FPOR.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 054	Y	Wisc Stats 289.30
If a spill occurs in a containment pallet or on the floor, the containment pallet or floor shall be decontaminated before waste or material is stored on the containment pallet or floor.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 055	Y	Wisc Stats 289.30
Within one (1) year after receiving the final determination of the FPOR, Brenntag shall have had a Licensed Professional Engineer review the Fuel Blending secondary containment storage area to make recommendations for repairs or for replacement of the secondary containment system. Repairs or replacement shall also be completed within one (1) year of Brenntag receiving final determination of the FPOR. Specifically, the secondary containment system shall have a base underlying the containers which is sufficiently impervious and continuous to hold spilled or leaked wastes or accumulated precipitation until it can be removed.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 056	Y	Wisc Stats 289.30
Brenntag will be prohibited from using the fuel blending storage area for storage and treatment of hazardous waste if the repairs or replacement of the secondary containment system is not completed within 1-year from the date of receiving the final determination of the FPOR.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 057	Y	Wisc Stats 289.30
Brenntag shall do the following in connection with the repair or replacement of the secondary containment system for the fuel blending storage area: a. Brenntag shall notify the Department at least 30 days prior to initiating construction or repairs within the secondary containment system area. b. Within 15 days after completing construction of the repair or replacement, a written statement shall be submitted to the Department certifying that the secondary containment system was constructed in substantial compliance with the approved FPOR or subsequent modification approval. c. Technical data, such as design drawings, design specifications and engineering studies shall be certified by a registered professional engineer. d. Brenntag shall provide as-built drawings to the Department within 15 days after completing construction of the repair or replacement of the secondary containment system. e. Any soil excavated or removed as part of the construction of the secondary containment system shall be properly characterized and managed.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 058	Y	Wisc Stats 289.30
Brenntag shall comply with all applicable statutes and rules relating to spills, leaks, or other releases of hazardous waste or other hazardous substances, including ch. 292, Wis. Stats., ch. NR 664 subch. D WAC and chs. NR 700 to 754, WAC.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 059	Y	Wisc Stats 289.30
Brenntag shall implement conditions 60 and 61 of this approval when any of the following conditions occur: a. General spills reporting requirement: If a discharged substance has adversely impacted or threatens to adversely impact the air, lands or waters of the state; caused or threatens to cause acute or chronic human health impacts if immediate actions, such as evacuation or in-place sheltering, are not taken; or presents or threatens to present a fire or explosion hazard or other safety hazard, in accordance with Wis. Admin. Code s. 706.05. The discharge notification form can be obtained at the following web address: http://dnr.wi.gov/files/PDF/forms/4400/4400-225.pdf. b. Spills occurring inside the buildings: Greater than five (5) gallons of hazardous materials. c. Spills occurring outside the buildings and secondary containment on paved areas that drains to the stormwater collection system: Greater than one (1) gallon of hazardous materials. d. All spills occurring on non-paved areas.			Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 060	Y	Wisc Stats 289.30
Brenntag shall provide immediate telephone notification to the Division of Emergency Government (Spills Line - 800-943-0003) when a release is covered by condition 59.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 061	Y	Wisc Stats 289.30
Brenntag shall submit a spill report to the Department in accordance with NR 706. In addition Brenntag shall submit a spill report to the department's designated Hazardous Waste Inspector assigned to Brenntag and to the Department's designated Hazardous Waste plan review staff person assigned to Brenntag and to the Department's designated Spills Coordinator within fifteen (15) days of incident.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 062	Y	Wisc Stats 289.30
Brenntag shall submit quarterly reports listing all spills of hazardous material greater than one gallon that occurred at the facility over the previous three (3) months. The report shall include the type and quantity of waste spilled, the location of the release, the source of the release, what actions were taken to clean up the release and what actions will be taken to prevent a release from recurring. The quarterly report shall be submitted to the Department's designated Hazardous Waste Inspector by the 15th day of April, July, October and January of each year that Brenntag maintains a hazardous waste operating license.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 063	Y	Wisc Stats 289.30
Brenntag shall determine if additional remediation is necessary in the south lot at locations of: 1) the vicinity of monitor wells MW-123, MW-138, MW-139, 2) the vicinity of monitoring wells along east property boundary (EW-7, MW-140, EW-6) and EW-4), 3) the vicinity of monitoring wells MW-133 and MW-134 on SW corner of South Lot, and 4) wells in the vicinity of the 45,000 ug/l contour (2009) including MW-135 in the sand and gravel, and IW- 4. a. Brenntag shall submit the determination to the Department's project manager by April 30, 2015. b. If additional remediation is necessary, Brenntag shall submit a Remedial Action work plan for groundwater remedial actions by June 30, 2015. c. Brenntag shall implement remediation within 90 days of receiving the Department's determination on the remedial action plan. d. Within 90 days of completing groundwater remediation, Brenntag shall submit a Remedial Action report in compliance with ch. NR 724 WAC and ch. NR 664 subch. F, WAC. The Remedial Action report shall describe the work conducted, and include recommendations for follow-up actions.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 064	Y	Wisc Stats 289.30
By April 30, 2015, Brenntag shall provide written response to the Department's comments on the 2011 work plan entitled 'Work Plan for Investigation and Interim Action, SWMUs G, H, I, J and K'.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 065	Y	Wisc Stats 289.30
Brenntag shall update the March 2011 work plan entitled 'Work Plan for Investigation and Interim Action, SWMUs G, H, I, J and K' by April 30, 2015, if additional investigation or interim actions are necessary.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 066	Y	Wisc Stats 289.30
Brenntag shall initiate the investigation work plan for SWMU's G, H, I, J, and K, within 60 days after receiving the Department's determination on the work plan.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 067	Y	Wisc Stats 289.30
Brenntag shall submit an investigation report in compliance with ch. NR 724 WAC and ch. NR 664 subch. F, WAC for SWMU's G, H, I, J, and K, within 90 days of completion of the investigation.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 068	Y	Wisc Stats 289.30
Brenntag shall submit a Remedial Actions Options Report (RAOR) for SWMU's G, H, I, J, and K, within 60 days of receiving the Department's investigation report determination.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 069	Y	Wisc Stats 289.30
Brenntag shall submit a remedial action plan for SWMU's G, H, I, J, and K, within 60 days of receiving comments from Department on the RAOR.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 070	Y	Wisc Stats 289.30
Brenntag shall implement remediation at SWMU's G, H, I, J, and K, within 90 days of receiving the Department's determination on the remedial action plan.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 071	Y	Wisc Stats 289.30
Brenntag shall have all remedial measures in place and operating by July 1, 2017.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 072	Y	Wisc Stats 289.30
By June 30, 2016, Brenntag shall identify additional soil sampling locations (as necessary) that are approvable by the Department project manager in order to: a. Determine the full nature, degree and extent of contamination (if any) caused by the migration of releases from SWMUs G, H, I, J, and K. b. Examine potential migration pathways. c. Examine releases to the lower saturated soil units. This information shall be included on all maps contained in subsequent work plans and investigation reports for, or in the vicinity of SWMUs G, H, I, J, and K				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 073	Y	Wisc Stats 289.30
Brenntag shall use Incremental Sampling Methodology (ISM) for the characterization of excavated soils, waste materials, and (where applicable) to determine if contaminated media is to be left in place. Information on ISM can be located at http://www.itrcweb.org/ism-1				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 074	Y	Wisc Stats 289.30
The number of samples selected for laboratory analysis from the Geoprobe® soil probes shall include 2 or more samples per boring, as necessary, to determine the vertical extent of contamination. The "50 instrument units" concentration criteria used during soil screening with the PID should not be the sole determination of the number or selection of any particular sample to be analyzed. All evidence of staining or odors shall also be considered. The selection criteria for the laboratory samples to be collected from the hand auger borings that do not exhibit staining shall use a benchmark PID reading of 25 units.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 075	Y	Wisc Stats 289.30
Within 90 days of completing a field sampling work plan, Brenntag shall submit a site investigation report in compliance with ch. NR 716.15 WAC and ch. NR 664 subch. F, WAC. The site investigation report shall include recommendations for follow-up actions.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 076	Y	Wisc Stats 289.30
Brenntag shall submit semi-annual progress reports of the investigations, interim actions, and remedial actions for SWMUs G, H, I, J and K. The reporting periods for the semi-annual reports are from October 1 to March 31 and April 1 to September 30. The semi-annual reports shall be submitted within 60 days of the end of each reporting period to the Department's project manager and the Department's assigned hazardous waste inspector.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 077	Y	Wisc Stats 289.30
Brenntag shall visually inspect the potential leak interface areas of each container used to store waste subject to CC for compliance with ch. NR 664 subch. CC, WAC.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 078	Y	Wisc Stats 289.30
Brenntag shall maintain in the facility operating record a record of all tests used to comply with the air emissions standards, visual inspections and monitoring, organic vapor determinations, and other documentation demonstrating compliance with ch. NR 664 subch. CC, WAC.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 079	Y	Wisc Stats 289.30
Brenntag shall comply with all applicable requirements of any active Department air pollution control permit document, and air management rules contained in chs. NR 400 to 499, WAC, as well as directives including, but not limited to, obtaining all necessary permits to operate in accordance with these rules. Brenntag shall notify the Department's Southeast Region hazardous waste investigator if any proposed changes (through air quality construction permits) to units subject to Subchapter AA, BB, CC, or other RCRA rules pertaining to air emissions.				Photo ☐

Under P-TSW

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 080	Y	Wisc Stats 289.30
Brenntag shall notify the Department's assigned hazardous waste inspector and hazardous waste permit writer if any proposed changes (through air quality construction permits) affect units subject to ch. NR 664 subch AA, BB, CC, or other RCRA rules pertaining to air emissions.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 081	Y	Wisc Stats 289.30
Brenntag shall follow the waste analysis plan as detailed in the FPOR submittal.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 082	Y	Wisc Stats 289.30
Brenntag shall retain records of all analytical information, including all calibration and maintenance records of laboratory instrumentation for a period of at least three (3) years from the date the waste was analyzed.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 083	Y	Wisc Stats 289.30
Brenntag shall indicate on the hazardous waste manifest, prepared for sending waste off site, all waste codes applicable to the hazardous waste prior to the commingling, recontainerization or bulking of hazardous waste on-site.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 084	Y	Wisc Stats 289.30
Brenntag shall follow the sampling collection guidance as outlined in U.S. EPA's SW-846, "Volume II, Field Manual". Sampling methods not covered by SW-846 must be acceptable to the Department.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 085	Y	Wisc Stats 289.30
Brenntag shall ensure that all samples collected are representative of the waste stream from which the samples are collected.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 086	Y	Wisc Stats 289.30
Brenntag shall ensure that the person(s) collecting the samples are trained in proper sample collection. B:LL				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 087	Y	Wisc Stats 289.30
Brenntag shall only combine wastes that are compatible.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 088	Y	Wisc Stats 289.30
Brenntag shall use a laboratory that is certified or registered by the State of Wisconsin.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 089	Y	Wisc Stats 289.30
Brenntag shall perform a physical and chemical analysis of a waste stream when: a. Brenntag is notified that the process or operation generating the waste has changed. b. Brenntag has reason to believe that the process or operation generating the waste has changed. c. Results of an inspection indicate that the waste to be collected does not match the waste designated.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 090	Y	Wisc Stats 289.30
Brenntag shall not modify the random selection process unless Brenntag has obtained Department concurrence.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 091	Y	Wisc Stats 289.30
Within forty-five (45) days of receiving a uniform hazardous waste manifest, Brenntag shall send one copy of the uniform hazardous waste manifest information to the Department in an electronic format specified by the Department in accordance with s. NR 664.0071(1)(b)4 Wis. Admin. Code.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 092	Y	Wisc Stats 289.30
Upon notification of a uniform hazardous waste manifest data quality issue by the Department, Brenntag, shall within five (5) business days, make the correction(s) and resubmit the uniform hazardous waste manifest information to the Department.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 093	Y	Wisc Stats 289.30
Brenntag's submittal of the uniform hazardous waste manifest information shall be identical to the information as describe on the uniform hazardous waste manifest.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 094	Y	Wisc Stats 289.30
Beginning in 2014, Brenntag shall begin quarterly, random, checks of five (5) percent of the paper manifests against Brenntag's electronic submittals to the Department for accuracy of the electronic data.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 095	Y	Wisc Stats 289.30
Brenntag shall submit quarterly reports of the manifest review. The report shall include the uniform manifest tracking number and the results of the review and what actions, if any, were taken to correct inaccurate data. The quarterly report shall be submitted to the Department's assigned hazardous waste inspector and hazardous waste permit writer by the 15th day of April, July, October and January of each year that Brenntag maintains a hazardous waste operating license or until Brenntag demonstrates there is consistently good agreement between paper manifests and electronic data, then the Department will consider reducing this to an annual requirement covering one (1) percent of the paper manifests.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 096	Y	Wisc Stats 289.30
Brenntag shall follow the closure plan as submitted in the FPOR when closing all or part of the hazardous waste activities covered by this plan approval.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 097	Y	Wisc Stats 289.30
Closure confirmation samples shall be grab samples. Closure confirmation sampling must show that all areas of a unit have been successfully cleaned and that no contamination above the wastewater standards identified in table 1 of s. NR 668.40 Wis. Admin. Code.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 098	Y	Wisc Stats 289.30
Field sampling methods shall follow the guidance in EPA's SW-846, "Volume II, Field Manual". Field sampling methods not covered by SW-846 must be acceptable to the Department before they are used to close the hazardous waste storage area(s).				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 099	Y	Wisc Stats 289.30
Sampling methods and equipment, as well as laboratory analytical methods, shall follow the guidance in U.S. EPA's SW-846, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, Third Edition" (see 40 CFR 260.11).				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 100	Y	Wisc Stats 289.30
Brenntag shall use the lowest possible analytical Method Detection Limit (MDL) for the hazardous constituents associated with listed hazardous wastes.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 101	Y	Wisc Stats 289.30
Brenntag shall report all concentration data, even if it is estimated, for compounds or elements that have been positively identified in the sample. Some target analytes are present at concentrations which are above the level that can be reliably detected but below the level that they can be reliably quantified. These data are referred to as "qualified" and will be reported as a number which has been "flagged" by the laboratory. Although less reliable than data which are reported above the Estimated Quantitation Limit (EQL), these qualified data must nevertheless be evaluated carefully by the Department.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 1012	Y	Wisc Stats 289.30
The closure report shall include a discussion/evaluation of the secondary containment area. This discussion/evaluation of the secondary containment area shall include any observations of visible contamination (i.e., staining caused by waste consisting of light shadows, slight streaks, or minor discolorations), cracks, crevices, and pits in the floor and any defects of the impervious coating used on the floor. Soil sampling will be required if defects are discovered in the secondary containment area that would allow the waste to penetrate the secondary containment area and affect the underlying soils.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 103	Y	Wisc Stats 289.30
The closure report shall include a discussion/evaluation of how the cleaning methods and the surfactants chosen are suitable for the contaminants. If detergent washing and water rinsing are selected, the closure report should show that the detergent solution will remove the contaminants of concern. This may be demonstrated with solubility data from product specification sheets or standard chemical tables. The length of time solutions are in contact with the surface and whether or not scrubbing or other physical efforts are used will affect the accuracy of the decontamination demonstration. Other useful considerations might include the temperature of the wash water and the pressure/nozzle that would be used to apply it to clean the surface. The effectiveness of chemical and physical decontamination will also depend on the unit's design, the cleaning solutions, and the constituents to be removed.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 104	Y	Wisc Stats 289.30
The closure report shall include a discussion/evaluation on the equipment used to clean the hazardous waste storage area(s), how this equipment was decontaminated and how the residues from the decontamination were handled.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 105	Y	Wisc Stats 289.30
The closure report shall include a discussion/evaluation of how waste materials (i.e., rinsate, debris, disposable equipment, etc.) from decontamination were managed and the volumes / quantity of waste materials that were generated by the decontamination efforts. The waste materials will need to be managed as a hazardous waste per s. NR 664.0178, Wis. Admin. Code.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 106	Y	Wisc Stats 289.30
The closure report shall include a drawing of the hazardous waste storage area(s) that are being closed. The drawing should show, at a minimum, dimensions and other construction details, appurtenant structures and relationship to other significant points or structures on the facility property. All drawings shall provide a specified scale, legend, and north arrows.				Photo ☐

FACILITY SPECIFIC CONDITIONS

Brenntag Active Hazardous Waste Conditions

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 107	Y	Wisc Stats 289.30
The closure report shall include a discussion on the types and quantities of hazardous wastes and materials that were stored in hazardous waste storage area(s).				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 108	Y	Wisc Stats 289.30
The closure report shall include a photo log documenting the decontamination of the hazardous waste storage area(s) and photos showing the 'clean' hazardous waste storage area(s). Each photo should be numbered, dated and include a description of what was photographed.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 109	Y	Wisc Stats 289.30
The closure report shall include a discussion/evaluation of the sampling strategy (i.e., sample collection, sample locations, number of samples collected, how the sample was collected and analytical considerations).				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 110	Y	Wisc Stats 289.30
The closure report shall include waste disposal documentation (e.g. bills of lading, uniform hazardous waste manifest, waste profile information).				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 111	Y	Wisc Stats 289.30
The closure report shall include a table summarizing the data reported by the lab. The table needs to include concentration data, even if it is estimated, for compounds or elements that have been positively identified in the sample.				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 112	Y	Wisc Stats 289.30
The closure report shall include a discussion/evaluation of any spills that have occurred in the hazardous waste storage area(s).				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 113	Y	Wisc Stats 289.30
Brenntag shall demonstrate that any residual contamination remaining in the hazardous waste storage area(s) is below regulatory or health based standards. To achieve clean closure, Brenntag will need to meet the wastewater standards identified in table 1 of s. NR 668.40 Wis. Admin. Code for the hazardous wastes that were stored in the hazardous waste storage area(s).				Photo ☐

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 114	Y	Wisc Stats 289.30
Brenntag shall maintain an up to date closure cost estimates and financial proof mechanism covering closure and liability requirements as defined in ch. NR 664, Subch. H, WAC. The owner financial proof mechanism shall be updated annually for inflation.				Photo ☐

FACILITY SPECIFIC CONDITIONS

Brenntag Active Hazardous Waste Conditions

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 115	Y	Wisc Stats 289.30
Brenntag shall establish owner financial responsibility for corrective action in accordance with the following schedule: a. Three hundred sixteen thousand, two hundred five dollars ($316,205) no later than June 1, 2015. b. Six hundred sixteen thousand, two hundred five dollars ($616,205) no later than June 1, 2016. c. Nine hundred sixteen thousand, two hundred five dollars ($916,205) no later than June 1, 2017. Brenntag shall maintain this amount, adjusted for inflation, until corrective action activities are completed. All financial responsibility instruments shall be written on forms supplied by the Department with no alterations or edits made to the wording of the forms.			Photo ☐	

04/15/2015	FEASIBILITY AND PLAN OF OPERATION RE	Condition # : 116	Y	Wisc Stats 289.30
Brenntag shall adjust the amount of owner financial responsibility when there are changes to the corrective action activities or the existing financial responsibility for the current corrective action activities is deemed insufficient by the Department.			Photo ☐	

Number of records: 115

Search Criteria: UPPER (EPA_ID) =WID023350192 AND UPPER (LEAD_PROGRAM) =HAZARDOUS WASTE AND UPPER (CONDITION_STATUS_TEXT) =ACTIVE

TRANSPORTATION & TRANSFER FACILITY INSPECTION

Revision: 10/02/2012
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of hazardous waste transfer facilities and hazardous waste transporters, evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapters NR 660 - 679, Wis. Adm. Code).

Section 1: Notification and Licensing

A. The transporter has submitted a notification form and obtained an EPA ID#. Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	663.11(1)
B. A transportation license has been issued to each location where transport vehicles are based. #10861	Y	663.13(1)(b)
C. If ownership changed, the new owner has re-applied for a transportation license by submitting a license application form.	N/A	663.13(1)(h)

Section 2: Manifest Requirements

A. The transporter ensures that the manifest accompanying the hazardous waste shipment is signed and dated by the generator.	Y	663.20(1)(a)
B. The transporter leaves a signed and dated copy of the manifest with the generator.	Y	663.20(2)
C. The transporter retains one copy of the manifest signed and dated by the TSDF or next transporter for a period of 3 years from the date the hazardous waste was accepted by the initial transporter.	Y	663.20(4)
D. The transporter delivers the entire quantity of hazardous waste from a generator or transporter to the following: 1. The designated facility listed on the manifest. 2. An alternate facility if an emergency prevents delivery to the designated facility. 3. The next designated transporter. 4. A facility outside of the U.S. as designated by the generator.	Y	663.21(1)
E. If the waste cannot be delivered to the designated or alternate facility because of an emergency situation, the transporter contacts the generator for further directions and revises the manifest according to the generator's instructions.	Y	663.21(2)(a)
F. If the transporter transports SQG waste pursuant to a reclamation agreement, ALL of the following requirements are met: 1. The name, address and EPA ID# of the generator; the quantity of waste accepted; DOT shipping information; and, the date the waste is accepted are recorded on the log or shipping paper for each shipment. 2. The transporter carries the log or shipping paper during transport of the waste to the reclamation facility. 3. The transporter retains the shipping records for a period of at least 3 years after termination or expiration of the agreement.	Y	663.20(8)

Section 3: Rejected Waste

A. The transporter has transported partial or full load rejections. If NO, go to Section 4.	Y	
B. For a partial load rejection or regulated container residue that occurs while the transporter is at the designated facility, the transporter obtains BOTH of the following: 1. A copy of the original manifest that includes the date and signature from the designated facility; the manifest tracking number of the new manifest accompanying the shipment; and, a description of the partial rejection or container residue in the discrepancy block. 2. A new manifest to accompany the shipment to an alternate facility or the generator.	Y	663.21(2)(b)1
C. If a full load rejection is taken back to the generator, the transporter obtains a copy of the original manifest or a new manifest.	Y	663.21(2)(b)2

Section 3: Rejected Waste

D. If the original manifest is used for a full load rejection, the original manifest includes ALL of the following: 1. The rejecting facility's signature and date of rejection. 2. A description of the rejection in the discrepancy block of the manifest. 3. The name, address, phone number, and ID# for the alternate facility or generator to whom the shipment will be delivered.	Y	663.21(2)(b)2
E. The transporter retains a copy of the manifest documenting the rejected shipment for 3 years from the date the hazardous waste was accepted by the initial transporter.	Y	663.22(1)

Section 4: Transfer Facilities

A. The transporter operates a transfer facility. If NO, go to Section 5.	Y	
B. All containers are stored for 10 days or less.	Y	663.12
C. Hazardous waste containers comply with the DOT packaging requirements stated in 49 CFR.	Y	663.12
D. If hazardous waste with different DOT shipping descriptions are mixed and placed into a single container, the transporter complies with applicable generator requirements stated in ch. NR 662. Note: The applicable generator requirements consist of the manifesting requirements in subch. B of NR 662.	Y	663.10(b)

Section 5: Hazardous Waste Discharge During Transportation

A. A hazardous waste discharge has occurred during transportation. If NO, go to Section 6.	NO	
B. The transporter took appropriate immediate action as required by ch. NR 708 (notify local authorities, dike the discharge area, etc.).	N/A	663.30(1)
C. The transporter complied with ALL of the following: 1. Notify the national response center at 800-424-8802. 2. Submit a written report to the DOT Office of Hazardous Materials Regulations in Washington, D.C. 3. Notify the Wisconsin Division of Emergency Management at 800-943-0003. 4. Comply with the spills notification and response requirements of s. 292.11, Stats, and ch. NR 706.	N/A	663.30(3)
D. If a discharge occurred during water transport, the transporter notified the National Response Center.	N/A	663.30(4)
E. The transporter cleaned up the hazardous waste discharge or took other required actions so that the discharge no longer presents a hazard to human health or the environment.	N/A	663.31

Section 6: Exporting Waste

A. The transporter transports waste out of the U.S. If NO, go to Section 7.	NO	
B. The transporter complies with ALL of the following requirements: 1. Signs and dates the manifest in the international shipments block of the manifest to indicate the date the shipment left the U.S. 2. Retains a manifest copy for 3 years from the date the hazardous waste was accepted by the initial transporter. 3. Returns a signed manifest copy to the generator. 4. Gives one manifest copy to the U.S. customs official at the point of departure from the U.S.	N/A	663.20(7)
C. The transporter ensures a copy of the EPA acknowledgement of consent accompanies the exported shipment.	N/A	663.20(3)
D. If the transporter transports waste into Wisconsin from another country, the transporter complies with the ch. NR 662 generator standards. Note: Complete the generator inspection form.	N/A	663.10(3)(a)

Section 7: Bulk Transport by Water or Rail

A. The transporter conducts bulk transport by water or rail. If NO, go to Section 8.	NO	
B. If bulk shipments are transported by water to the designated facility, ALL of the following are met: 1. A shipping paper containing all of the manifest information, excluding the EPA ID #'s, generator certification and signatures, accompanies the hazardous waste. 2. If the waste is exported, an EPA acknowledgement of consent accompanies the hazardous waste. 3. The delivering transporter obtains the date of delivery and signature of the designated facility on the manifest or shipping paper. 4. The person delivering the hazardous waste to the initial water transporter obtains the date of delivery and signature of the water transporter on the manifest and forwards it to the destination facility. 5. The water transporter retains a copy of the shipping paper or manifest for 3 years from the date the waste was received by the initial transporter.	N/A	663.20(5)
C. If shipments are transported by rail, the initial rail transporter does ALL of the following when accepting hazardous waste from a non-rail transporter: 1. Sign and date the manifest. 2. Return a signed copy of the manifest to the non-rail transporter. 3. Forward at least 3 copies of the manifest to the next non-rail transporter; the designated facility if the shipment is delivered by rail; or, the last rail transporter handling the waste in the U.S. 4. A copy of the manifest and rail shipping paper is retained for 3 years from the date the waste is accepted by the initial transporter.		663.20(6)(a)
D. The rail transporter ensures a shipping paper containing all of the manifest information, excluding the EPA ID #'s, generator certification and signatures, accompanies the hazardous waste.		663.20(6)(b)
E. If the waste is exported by rail, an EPA acknowledgement of consent accompanies the hazardous waste.		663.20(6)(b)

Section 7: Bulk Transport by Water or Rail

F. The final rail transporter delivering hazardous waste to the designated facility complies with BOTH of the following: 1. The date of delivery and signature of the designated facility are obtained on the manifest or the shipping paper, if the manifest has not yet been received by the facility. 2. A copy of the signed manifest or signed shipping paper is retained for 3 years from the date the waste was accepted by the initial transporter.		663.20(6)(c)
G. The rail transporter complies with BOTH of the following when delivering hazardous waste to a non-rail transporter: 1. Obtains the date of delivery and signature of the non-rail transporter on the manifest. 2. A copy of the signed manifest or signed shipping paper is retained for 3 years from the date the waste was accepted by the initial transporter.		663.20(6)(d)
H. The non-rail transporter does BOTH of the following when accepting hazardous waste from a rail transporter: 1. Sign and date the manifest. 2. Provide a copy of the manifest to the rail transporter.		663.20(6)(e)

Section 8: Status Evaluation

A. Describe other activities conducted by the transporter and complete appropriate inspection reports.	LQG, Liquid Storage Treatment

UNIVERSAL WASTE HANDLER INSPECTION REPORT - LARGE QUANTITY HANDLER

Revision: 10/02/2012
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate or handle 5000 kg or more of universal waste (hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices), evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapters NR 660-679, Wis. Admin. Code). The Universal waste regulations streamline the requirements for hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices. Persons treating, disposing, recycling, or otherwise processing universal wastes are subject to applicable hazardous waste regulations.

Section 1: Prohibitions

A. Universal waste is not disposed on-site.	Y	673.31(1)
B. Universal waste is not diluted or treated on-site. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	Y	673.31(2)

Section 2: General Standards

A. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	Y	673.33
B. Universal waste pesticides and lamps are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	Y	673.33
C. Sorting, mixing or handling of batteries is only conducted if the battery casing is not breached and remains intact.	Y	673.33(1)(b)
D. Wastes generated by handling or cleaning up spills of universal wastes are managed according to hazardous waste or solid waste rules.	Y	673.33
E. If mercury containing ampules are removed from thermostats, the handler meets ALL of the following: 1. Ampules are removed In a manner that prevents breakage. 2. Removal is conducted over a containment device. 3. Spills or leaks are cleaned up immediately. 4. Removal is performed in a well ventilated, monitored environment.	Y	673.33(3)(b)
F. Pesticides are placed in a tank that meets NR 665 subch. J requirements, except closure and post closure requirements in NR 665.0197(3) and waste analysis requirements in NR 665.0200.	N/A	673.33(2)
G. Pesticides are placed in a transport vehicle or vessel that is closed, structurally sound, not leaking and compatible with the waste.	Y	673.33(2)
H. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	Y	673.34
I. Containers, tanks, or transport vehicles of recalled pesticides are additionally marked with the label that was on or accompanied the product when it was sold or distributed.	Y	673.34
J. Length of accumulation time is demonstrated by ANY of the following: 1. Mark or label each container with the earliest date the waste is generated or received. 2. Mark or label the individual item of waste with the date it was generated or received. 3. Maintain an inventory system identifying the date the waste was generated or received. 4. Place the universal waste in a specific accumulation area identified with the earliest date the waste was generated or received. 5. Use some other method that clearly demonstrates the length of accumulation time.	Y	673.35(3)
K. Universal waste is accumulated for less than one year from the date generated or received from another handler.	Y	673.35(1)
L. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	N/A	673.35(2)

Section 2: General Standards

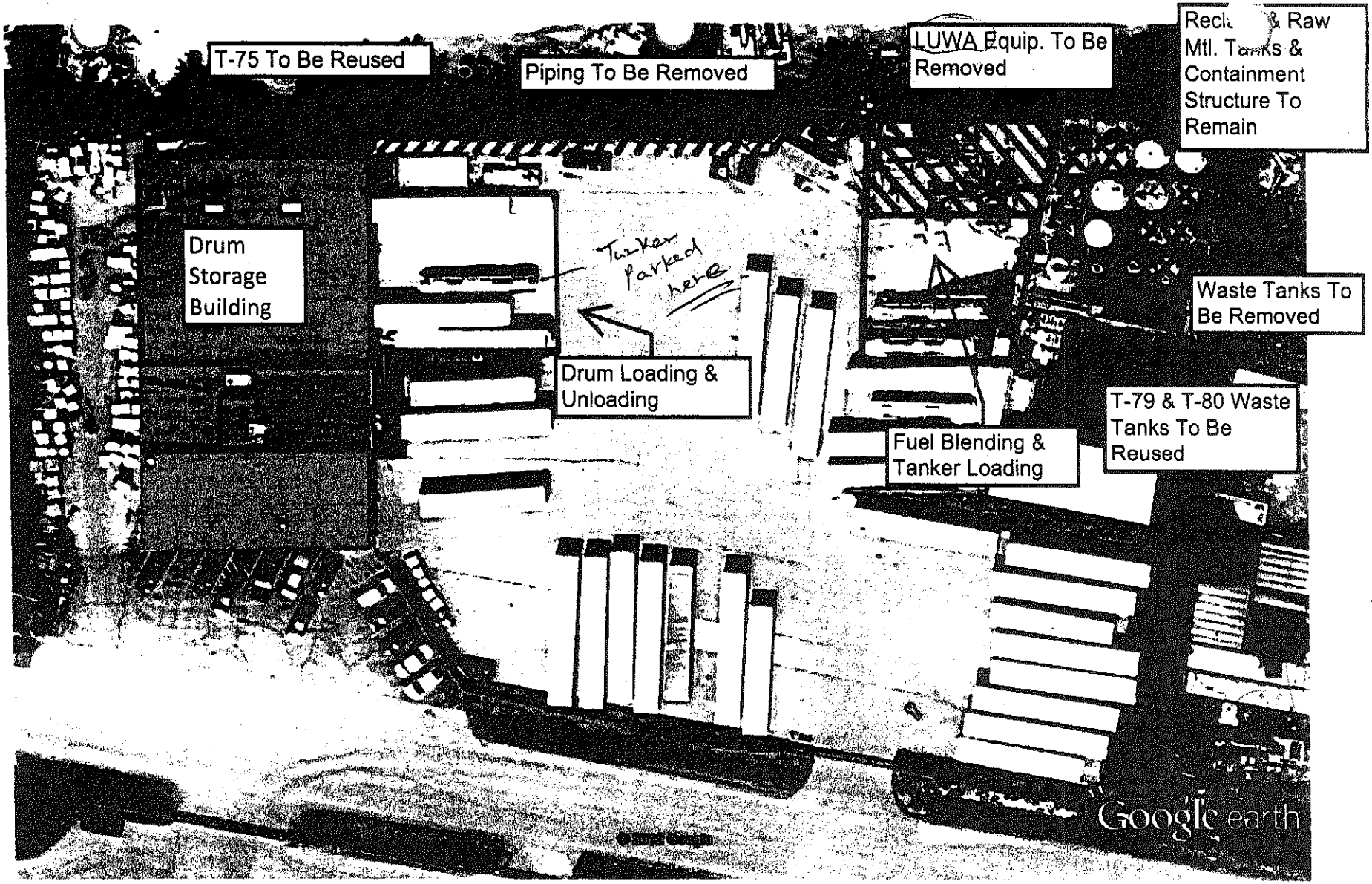
M. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	Y	673.36
N. Handler complies with ALL of the following when a release occurs: 1. Immediately contains the release. 2. Determines if the spill residue is hazardous waste. 3. If hazardous waste, disposes of it as such.	Y	673.37
O. EPA ID# was obtained before meeting or exceeding 5,000 kg (11,025 lb).	Y	673.32(1)

Section 3: Off-site Shipments

A. Handler sends the waste to a destination facility, foreign destination or another handler.	Y	673.38(1)
B. Handler that self-transports complies with ALL of the following: 1. Applicable US DOT regulations in 49 CFR parts 171 to 180 when transporting universal waste that meets the definition of hazardous materials. 2. Immediately contain release and make waste determination on spill residue. 3. If shipped to a foreign destination other than an OECD country, use an EPA acknowledgement of consent.	Y	673.38(2)
C. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	Y	673.38(3)
D. If shipping to another universal waste handler, the handler has agreed to receive the shipment.	Y	673.38(4)
E. If a shipment was rejected, EITHER of the following occurred: 1. The waste was sent back to the originating handler. 2. The originating handler agreed on a destination facility to which to ship the waste.	Y	673.38
F. The handler immediately notifies the Department if they receive a shipment containing hazardous waste.	Y	673.38(7)
G. Nonhazardous, nonuniversal waste in a universal waste shipment is managed in compliance with the solid waste requirements.	Y	673.38(8)

Section 4: Record Keeping

A. Records for each shipment of universal waste received at the facility contains ALL of the following information: 1. The name and address of the originating handler or foreign shipper. 2. The quantity of each type of universal waste received. 3. The date the shipment was received.	Y	673.39(1)
B. Records for each shipment of universal waste sent off-site contains the following information 1. The name and address of the facility to which the waste was sent. 2. The quantity of each type of universal waste sent. 3. The date the shipment of universal waste left the facility.	Y	673.39(2)
C. Records are retained for at least 3 years from the date the shipment was received or from the date the shipment left the facility.	Y	673.39(3)

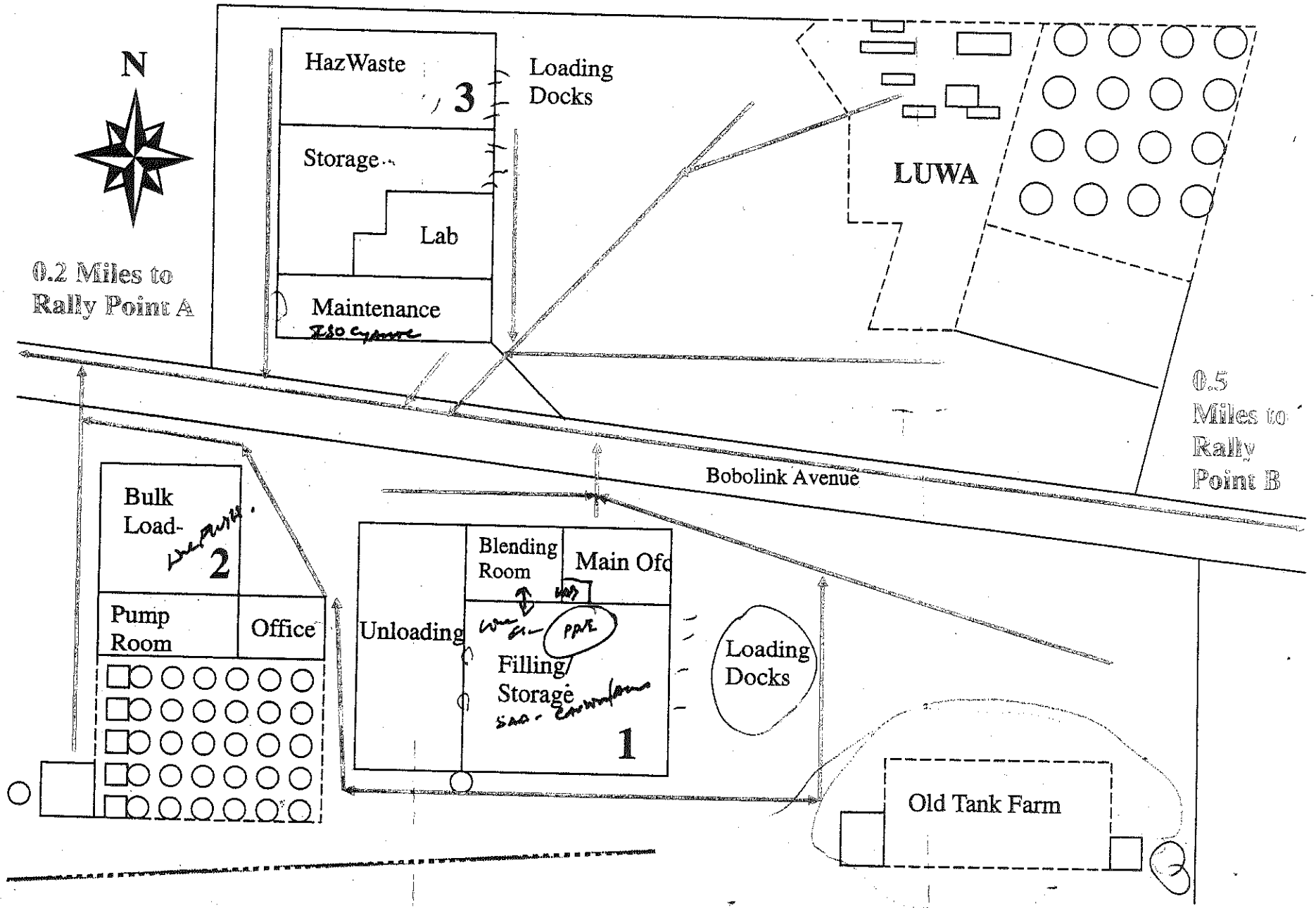


Google earth

feet 200
meters 80

Brenntag Great Lakes, LLC
N59 W14776 Bobolink Ave.
Menomonee Falls, WI 53051
Delineation of Existing Structures
For Storage Treatment & Disposal
5/24/13 Project: 12047

Brenntag Great Lakes – Menomonee Falls Evacuation Routes



Brenntag Great Lakes, LLC
Menomonee Falls, Wisconsin
5/18/2016

Photograph #1 – South Lot Quality Control Laboratory, SAA Containers of Flammable Liquids and Used PPE

Photograph #2 – South Lot Blending and Packaging Room, 55-Gallon SAA Container of Waste Acetone/MEK

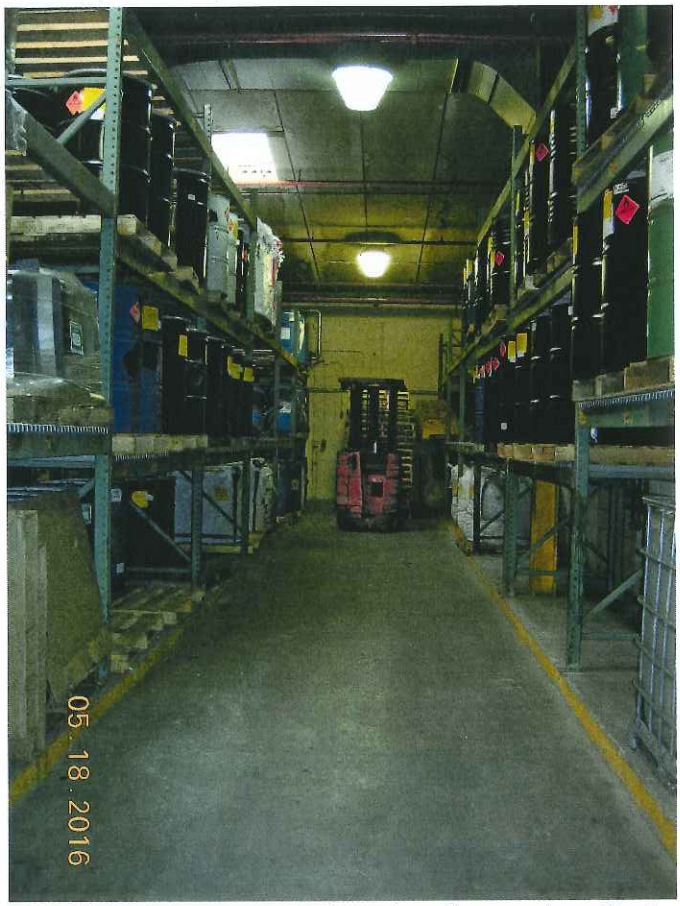
Brenntag Great Lakes, LLC
Menomonee Falls, Wisconsin
5/18/2016

Photograph #3 – North Lot Container Storage Area South, 1 Cubic Yard Container of F006 Hazardous Waste

Photograph #4 – North Lot Container Storage Area South, 55-Gallon Containers for Fuel Blending

Brenntag Great Lakes, LLC
Menomonee Falls, Wisconsin
5/18/2016

Photograph #5 – North Lot Container Storage Area South, 55-Gallon Containers for Fuel Blending



Photograph #6 – North Lot Container Storage Area South

Brenntag Great Lakes, LLC
Menomonee Falls, Wisconsin
5/18/2016

Photograph #9 – North Lot Container Storage Room North

Photograph #10 – North Lot Container Storage Room North, 10-Day Transfer Area and 55-Gallon Used Aerosol Cans SAA Container

Brenntag Great Lakes, LLC
Menomonee Falls, Wisconsin
5/18/2016

Photograph #7 – North Lot Universal Waste Accumulation Area

Photograph #8 – North Lot Universal Waste Accumulation Area

Brenntag Great Lakes, LLC
Menomonee Falls, Wisconsin
5/18/2016

Photograph #11 – North Lot Fuel Blending Area and Reclaimed Solvent Tanks